

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

Ind. No.: S1-19-CR-254 (ALC)

-v-

**NOTICE OF MOTION IN  
SUPPORT OF DEFENDANT  
REGINALD FOWLER'S  
PRETRIAL MOTIONS**

REGINALD FOWLER,

*Defendant.*

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PLEASE TAKE NOTICE, that upon the accompanying Declaration of Edward V. Sapone, Esq., the attached exhibits, and the supporting Memorandum of Law, dated October 14, 2021, counsel will move this Honorable Court, at a date and time convenient to the Court and the Government, on behalf of Defendant REGINALD FOWLER, for an Order:

- (1) suppressing all evidence obtained during the search and seizure of various bank accounts pursuant to a seizure warrant, and all evidence obtained as a result of this seizure (fruits of the poisonous tree);
- (2) directing the Government to particularize the indictment;
- (3) directing the Government's disclosure of *Brady* material;
- (4) establishing a timetable for Government disclosure of all discovery prior to trial; and
- (5) for any additional relief this Court deems just and proper.

Dated: New York, New York  
October 14, 2021

Yours etc.,

Sapone & Petrillo, LLP

/s/Edward V. Sapone

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